

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING)
PHARMACY, INC. PRODUCTS LIABILITY)
LITIGATION)

THIS DOCUMENT RELATES TO:) MDL No. 2419
All Suits Against the Saint Thomas Entities) Dkt. No 1:13-md-2419 (RWZ)

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**SAINT THOMAS ENTITIES' NOTICE OF FILING OF
DEPOSITION NOTICES TO BELLWETHER CANDIDATE PLAINTIFFS**

The Saint Thomas Entities,¹ pursuant to Federal Rule of Civil Procedure 30, come now and give notice to the Court and to all parties of the issuance and filing of the following:

1. Amended Notice of Taking Videotaped Deposition Duces Tecum to Bellwether Candidate Plaintiff Mae Parman²
2. Amended Notice of Taking Videotaped Depositions Duces Tecum to Bellwether Candidate Plaintiff Denis Brock and Plaintiff Jerry Brandt Brock³
3. Amended Notice of Taking Videotaped Depositions Duces Tecum to Bellwether Candidate Plaintiff Lewis Ray Sharer and Plaintiff Barbara Sharer⁴
4. Notice of Taking Videotaped Depositions Duces Tecum to Bellwether Candidate Plaintiff Basil McElwee and Plaintiff Carla McElwee⁵

¹ Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

² Ex. 1.

³ Ex. 2.

⁴ Ex. 3.

⁵ Ex. 4.

5. Notice of Taking Videotaped Depositions Duces Tecum to Bellwether Candidate Plaintiff Anna Sullivan and Plaintiff C. Dale Sullivan, Sr.⁶

The depositions of Bellwether Candidate Plaintiff Reba Skelton and Plaintiff Roy Skelton, which were previously noticed to occur on November 24, 2015, have been postponed at Plaintiffs' request. The Saint Thomas Entities will file an amended notice to reflect the new date and time of the depositions.

⁶ Ex. 5.

Dated: November 19, 2015

SAINT THOMAS HEALTH, SAINT THOMAS NETWORK, and SAINT THOMAS WEST HOSPITAL

By their attorneys,

/s/ Sarah P. Kelly
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*Appearing Pro Hac Vice

CERTIFICATE OF SERVICE

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 19th day of November, 2015.

/s/ Sarah Kelly
Sarah P. Kelly